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April 15, 2008

United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Independent Asset Management, LLC v. Daniel Zanger (1:07-CV-  
06431-JSR)

To the Clerk of Court:

We attempted to file this document last night multiple times. Due to a failure with the ECF system, however, we were unable to do so. We gave notice and a copy of the documents to opposing counsel.

Sincerely,



Craig Stuart Lanza

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**INDEPENDENT ASSET  
MANAGEMENT, LLC,**

**Plaintiff,**

**- against -**

**DANIEL ZANGER,**

**Defendant.**

**1:07-CV-06431-JSR**

**ECF**

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiff's Motion for Summary Judgment and the Declaration of Craig Stuart Lanza, and the exhibits annexed thereto, Plaintiff Independent Asset Management, LLC, by its attorneys, Balestriere Lanza PLLC, will move this Court before the Honorable Jed S. Rakoff, United States District Court Judge, for an order entering judgment against Defendant Daniel Zanger on all of Plaintiff's claims, except as to the amount of damages, pursuant to Rule 56 of the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that all papers shall be filed in accordance with the briefing schedule set forth by the case management order.

Dated: New York, New York  
April 14, 2008

Respectfully submitted,

/s Craig Stuart Lanza  
Craig Stuart Lanza (CL-2452)  
John Balestriere (JB- 3247)  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the foregoing document was served on the following counsel of record on April 14, 2008, via the methods listed below:

**By ECF and First Class Mail**

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/s/ Craig Stuart Lanza  
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